BENCHMARKS: WorldCom's Mass Markets operational experts believe that 95% in 24 hours is a more than generous period of time for the ILECs to provide notice of customer losses.

Provisioning Measures

Most ILECs, with a few exceptions, have implemented the provisioning metrics listed below. Long waits for service and missed appointments can harm the CLEC-customer relationship, and lead to the customer's prompt return to the ILEC. Held facilities, particularly those due to facilities reasons the ILEC could have anticipated also need to be measured. Some processes, such as hot-cuts, particularly those involving Local Number Portability, also need a special on-time performance metric with targeted business rules.

13. Average Completion Interval (with dispersion around average)

This metric shows whether the ILEC met the standard interval requested by the CLEC (as long as the interval is not shorter than the product interval offered by the ILEC.) The Missed Appointments measurements cover more orders, but Average Interval metrics are the only ones that highlight situations where an ILEC might be making its due dates by giving the CLEC longer than the standard internal requested. This metric also captures how long service delivery takes for orders where the standard interval is requested. This metric is crucial, particularly when there is no Offered Internal metric to see how often the CLEC gets the standard interval when requested. The dispersion reporting as part of this metrics can be used to help periodically reset benchmark intervals for the products disaggregated under this metric.

BUSINESS RULE: Requests longer and shorter than the standard interval are excluded so as not to skew results. Customer Not Readies (CNRs) are excluded if verified with the CLEC that the ILEC tried to delivery service and gave the CLEC time to correct a CNR or No Access Situation by calling an 800 number designated by the CLEC and giving the CLEC time to reach the customer.

BENCHMARK: The averages should come out to the standard interval for the specific products being measured.

14. Percent Orders Completed On Time

This metric captures whether the ILEC met its committed due date no matter whether shorter, longer, or within the standard interval.

BUSINESS RULE: The business rule allows for no exclusions for the type of interval requested, and verified CNRs are treated similarly. If the due date is changed by an unsolicited due date confirmation, then the first due date is considered missed. Successful acceptance testing may be used to designate the delivery of xDSL loops in a timely manner. Also estimated construction completion dates will be used to measure timeliness unless superseded by a FOC/LSRC at least 10 days before the due date.

BENCHMARK: A 95% benchmark is used for each standard interval noted in Attachment A. CLECs believe benchmarks are reasonable based on their experiences with ILEC retail product provisioning.

15. Percent Timely Coordinated Conversions

Timely conversions within set cutover windows keep customers from being out of service too long when changing carriers. Early cuts and late translation changes had been problems in the past for the industry, which should be captured, as a late cut in this performance measurement.

BUSINESS RULE: This is a specialized on-time performance metric, which WorldCom is proposing as a separate measurement rather than include it as another disaggregation under the Percent Orders Completed On-time metric. A disaggregation for Stand Alone LNP covers coordinated cuts with a Special Access link that would not have the link cutover part be captured in the metric. The ILEC could consider the LNP part a local product. Also, cuts with IDLC facilities involved would not have any different cutover scheduling than another other cut to avoid longer disruptions for the customer and to treat such facilities, as they would in the ILEC's network.

BENCHMARK: The cutover windows are similar to those used in the Verizon region except for the addition of a 90-minute cutover volume. Verizon had gone from an hour cutover volume directly to a two hour cutover volume, but WorldCom added the 90 minute step between the two as most of its cuts fall into this volume category.

16. (a) Average ILEC Caused Provisioning Outage Duration; (b) Percent ILEC Caused Provisioning Outages

Unplanned outages from early facilities cuts or LNP translation mistiming can really upset an end-user customer's business and cause it to switch back to the ILEC as soon as possible. It is important to avoid the problem in the first place, but if these service disruptions occur the end-user's service must be restored promptly. The percent outages metric captures the magnitude of the problem with outages, while the duration metric captures the time to restore the customer.

BUSINESS RULE: Any CLEC-caused outage would be excluded from the metric. The time begins when the CLEC or its customer reports the outage. A special toll-free number may be needed to report such troubles and have them measured when the CLEC cannot log them in the maintenance and repair systems of the ILEC because the provisioning is not yet complete. The problem should not be logged as a retail trouble for the ILEC, where a high incident of such troubles could be used to show that the CLEC's trouble after install rate is similar to the ILEC's.

BENCHMARK: Very strict benchmarks are needed for this metric. Usually the ILEC knows what type of action caused the problem, so it should be able to resolve the problem in under an hour. Most ILECs have this metric, but few measure it against a benchmark, and WorldCom has often seen restoral time of 40 hours or more on average. Although the early cut problems have decreased for many ILECs, these long periods of customer outages are unacceptable.

17. Percentage of Orders Held > 5, 15, 30 Days

The metric is an open order in hold status metric, similar to the FCC's proposal. The measurement does not require order completion to be measured. Orders that are past their standard interval (no LSRC/FOC received) or due date (LSRC/FOC received) are measured pending completion at the end of the reporting period. On-time performance can be made to look good by holding up orders until they are cancelled. This metric is a key companion to the on-time performance and average interval metrics. A diagnostic disaggregation on the percent of hold orders due to facilities also shows whether the ILEC has been responsive in building facilities for expected CLEC volumes. Even with a benchmark for total held orders, it is critical to see retail performance to determine if discrimination is occurring.

BUSINESS RULE: The metric includes a means of including projects in the calculation, because larger orders are often most affected by facilities holds. The standard interval is used as a surrogate for the due date for orders that have not received an LSRC/FOC. Only orders cancelled before the due date should be excluded from the metric.

BENCHMARK: These benchmarks are strict because there should be very few orders held for more than 5 days past the due date.

18. Troubles Within 30 Days of Install/Order Activity

This traditional metric indicates where there might be problems with the ILEC's provisioning quality.

BUSINESS RULE: Many ILECs exclude repeat troubles within 30 days of installation from the calculation, but WorldCom believes that these need to be included because repeat troubles after install also are indicative of sloppy provisioning and resolution of CLEC trouble tickets. The denominator for this metric needs to be the number of orders within the 30 day post installation period covered in the reporting period. The use of total installed base masks the magnitude of post-provisioning problems so unlike the trouble rate metric, only trouble tickets are used in the denominator.

BENCHMARK: The 1.5% standard is critical to ensuring that the CLEC's customers have good post-migration impressions. WorldCom submits that this is a reasonable benchmark, one that many ILECs appear capable of achieving on their retail products.

Maintenance Metrics

19. Mean Time to Restore

This is another traditional metric that is critical to CLECs being able to satisfy and retain their customers. Long outages without repair can easily drive the customer back to the ILEC's network.

BUSINESS RULE: To help ensure that trouble tickets are not closed without being resolved, WorldCom has proposed that the stop time for this measure be when the ILEC reports back to the CLEC that the trouble has been resolved. The metric also defines the meaning of "resolved."

BENCHMARK: Before signing a contract for CLEC service, business customers often seek service level agreements on timeliness of trouble resolution. A rolling parity metric makes it hard for the customer to establish such an agreement. For this metric, WorldCom has chosen to set the benchmarks based on whether the trouble requires a dispatch (often lengthening the repair interval) or not.

20. Trouble Report Rate

This metric shows the overall quality of the ILEC network. Because the rate is compared to installed base, this metric can be used as a general indicator of whether the CLEC is receiving the same quality loops or other products that the

ILEC's retail customers are receiving. Moreover, it ensures that the ILEC is not reserving the better facilities for itself. It tells a different story than Trouble After Install and Repeat Trouble metrics.

BUSINESS RULE: The denominator covers installed based, unlike other trouble metrics. Only troubles cancelled by the ILEC, troubles tracked for monitoring except where the trouble is determined to be in ILEC facilities, and subsequent reports on the same trouble, are excluded. For all the maintenance metrics, WCOM proposes not to exclude troubles closed as No Trouble Found, Found OK (FOK), Test OK (TOK), or CPE. WCOM has found that troubles have been closed with these codes erroneously. WCOM would prefer the exclusion with the ILEC always having the right to report to regulators incidences where an individual CLEC appears to be falsely reporting troubles. In some cases, CLECs have to pay for wrongly reported troubles, which is an incentive against false reporting. It is burdensome and costly for CLECs to track down for reconciliation these types of exclusions for large volume products. While WorldCom has proposed such exclusions (with numbers excluded reported monthly) in its access metrics, the cost margins to support such policing through monthly reconciliations of local orders make this approach prohibitive. The Commission can recommend that the ILEC report on a monthly basis the frequency of these codes, which can be monitored to see if they occur more often for the CLEC than ILEC retail customers, indicating possible abuse of the CLEC's part.

BENCHMARK: WCOM believes the benchmark of 1 per 100 access lines/loops is reasonable. Customers are used to highly reliable phone service and this benchmark is critical to ensure reliability. Sometimes the retail analog used for a parity comparison is a weak one, particularly when high capacity services for business customer are involved.

21. Percent Repeat Troubles

A high trouble report rate indicates either poor provisioning quality by the incumbent or poor repair work. Repeat troubles mean that carriers' customers are being disrupted repeatedly as the same circuit(s) continue to go out of service or perform inadequately.

BUSINESS RULE: The same exclusions and non-exclusions as the other maintenance measures are used here. Should regulators require exclusions for NTF/FOK/TOK/CPE, an additional business rule is needed to include those troubles in the repeat trouble metric when another trouble is reported on the line in the same period. The denominator includes all troubles reported rather than total installed base, which will show the degree to which the trouble might not have been fixed in the first round or whether facilities are poor and prone to repeat troubles.

BENCHMARK: WorldCom is proposing a 3% repeat trouble rate for DS3 facilities and above (UNE loops and Transport) because of the volume of customer activity that can be affected. First time repairs should stick for the higher-capacity loops.

22. Percent of Customer Troubles Resolved Within Estimated Time

Customers expect their troubles to be repaired within the estimate quoted to them by the ILEC. Missing such estimates is another way the CLEC's relationship with the customer can be harmed. This is a critical, traditional maintenance measure that was excluded from the Commission's short list in this NPRM.

BUSINESS RULE: If the CLEC proposes a different estimated restoral time, either later in time or earlier (by paying for an expedited restoral), that estimate should be used to calculate whether the quoted restoral time was met.

BENCHMARK: CLECs expect a high degree of accuracy, as do their customers, in meeting projected repair intervals. WorldCom has proposed a 98% benchmark because the time judged against is usually one quoted or agreed to by the ILEC.

Network Performance

23. Percent Trunk Blockage

Customers expect each and every call to go through. Customers who cannot have their calls go through or do not receive all their calls will inevitably blame the CLEC, not the ILEC for service failure. ILECs must size their networks to fit their CLEC customers' needs to prevent blockage of end user customer calls.

BUSINESS RULE: ILEC processes for measuring blocking are outdated. Most ILEC use a consistent busy hour to judge whether blocked trunks need to be augmented. With the advent of the Internet, trunks can be blocked at different times of day and the traffic patterns are different from the traditional voice network. WorldCom proposed that any trunk missing its blocking design threshold whether 0.5%, 1% or 2% four times in the month should be counted as an incident of failure.

BENCHMARKS: Because performance is measured against the design threshold and whether blocking occurs more than 4 times in the month, no more than 1% trunks exceeding their blockage design should be permitted. ILECs need to be motivated to respond to CLEC trunk resizing requests in a timely manner to avoid blocking in the first place. WorldCom often makes its own performance look bad to customers by holding up adding customers until trunks are augmented to avoid blocking.[59] If the standard is changed to parity, further disaggregation will be necessary.

24. Percent Timely Collocation Responses

To meet their business plans, CLECs need to know whether collocation space is available and the associated costs for the space. Lengthy response time on the part of ILECs harms the CLEC's ability to expand to reach additional customers in a tight economy.

BUSINESS RULE: The business rule of note in this metric is that the response is considered late if it is queried after the due date for a response.

BENCHMARK: Most ILECs notify CLECs of space availability within ten days so it should not be difficult for the ILECs to meet the benchmarks proposed.

25. (a) Percent Collocation/Augment Appointments Met/ (b) Average Collocation/Augment Interval

[59] The New York Carrier Working Group currently is discussing putting more emphasis on timely trunk provisioning to stay ahead of blocking, particularly how to monitor and avoid delays in projects.

ILECs must meet their obligations to meet collocation and/or augment appointments so that CLECs may expand their products and reach to customers in the marketplace. When ILECs fail to meet their collocation commitments, CLECs pay the price of lost revenues.

BUSINESS RULE: The rules define completion of the collocation arrangement as "the arrangement is suitable for use by the CLEC and the cable assignment information necessary to use the facility has been accurately provided to the CLEC." Similarly language has been included in collocation interval metrics in various ILEC regions to ensure that the ILEC does not count unusable collocations as timely delivered.

BENCHMARK: The benchmarks are in line with those adopted by the Commission. Many states have adopted shorter augment intervals when activity does not require the time of constructing a new collocation arrangements, times for augments are defined in many cases for 20, 30, 45 and 60 day augments. Augments can be aggregated with collocation type for the on-time metrics but not the Average Interval metrics.

The ILECs treat adding cabling to collocation arrangements for line sharing and xDSL loops as "collocation augments." It goes without saying that adding cabling to an existing collocation arrangement should not be subject to the long interval for stand-alone collocations. Thus, WorldCom is proposing augment intervals that are shorter than the standard collocation intervals.

26. NXXs/LRNs Loaded Before LERG Effective Date

Failure to load the CLEC's NXXs into the ILEC's switches and tandems and to perform testing by the LERG (Local Exchange Routing Guide) effective date can delay a CLEC's switch launch. In addition, it can keep a new customer from getting personal or business calls and decrease the non-toll calling area to which they are accustomed. Misloading of LRNs for the CLEC's new switches in the ILEC's region can cause routing problems for calls to the CLEC customers.

BUSINESS RULE: The measurement covers both additions and deletions to NXX codes. NXX loading procedures include central office/tandem translations, verification of translations, call through testing, and AMA testing. Expedites are among the exclusion.

BENCHMARK: The proper loading of NXXs is critical to customers receiving their calls and a long interval is provided for the loadings, which generally are automated. Therefore, a high standard of 100% is proposed. The ILECs that have this metric also have adopted the 100% standard.

Billing Metrics

27. Timeliness of Daily Usage Feed

CLECs depend on ILEC delivery of timely and accurate billing information. Slow or delayed billing information impedes the CLEC's ability to bill its customers in a timely manner, thereby delaying payment for service provided. Moreover, customer service inquiries due to delayed customer billing is expensive to the CLEC and creates the false impression that the CLEC is not able to provide quality service.

BUSINESS RULE: The usage feed would be counted as untimely if formatting errors held up its transmission.

BENCHMARK: A three-day interval is reasonable to cover switches that do and do not provide daily feeds.

28. Timeliness of Carrier Invoice

Timely receipt of carrier invoices is necessary for CLECs to audit charges and analyze costs. Late invoices, whether the detailed or summary bill, greatly inconveniences and harms a CLEC's ability to monitor its costs. Further, carrier invoices must be provided to the CLEC in the agreed upon format. Otherwise, receiving bills in a format not agreed to, but within the specified time, delays audits and analysis because of the unusable format of the information.

BUSINESS RULE: Only bills sent in the format requested by the CLEC can be counted as timely (*e.g.*, paper bills do not count as on time where the CLEC's preferred electronic transmission failed).

BENCHMARK: Ten business days before bill date is a reasonable interval. Therefore, the high on-time standard of 98% should be met.

29. (a) Billing Error Correction Requests Acknowledged in X Hours; (b) Billing Errors Corrected in X Days

ILECs must be responsive to requests to correct billing errors on wholesale invoices. This metric is currently being implemented by more and more ILECs as an alternative to other order accuracy metrics where the ILEC can hold up adjustments to make them look like parity.

BUSINESS RULE: Disputed adjustments may be excluded so long as the ILEC reports on the number and time pending.

BENCHMARK: Benchmark intervals are attainable and differentiated by the type of problem that needs to be resolved (a shorter 3-day interval for format, and a longer 5-day interval for content problems) or the speed at which an adjusted invoice can be provided.

IV. CONCLUSION

For the foregoing reasons, the Commission should adopt WorldCom's proposed measurements and standards and order them as a minimum baseline that the states are free to go beyond.

Respectfully submitted,

Kimberly Scardino
Lisa Youngers
Karen Reidy
Lori Wright
WorldCom, Inc.
1133 19th Street, NW
Washington, D.C. 20036
(202) 736-6478 (voice)
(202) 736-6492 (fax)
Kimberly.Scardino@wcom.com

APPENDIX A

STATE METRICS MATRIX PREPARED BY WORLDCOM

ILEC/ State	Has State Ordered Metrics and Standards	Docket/ Order Number	How Metrics and Standards Were Adopted	Whether Metrics and Standards Are Regional or State Specific	Does State Hold Periodic Reviews of the Metrics and Standards	Whether Metrics and Standards Have an Associated Remedy Plan	Whether a 3rd Party Tested or Audited the Metrics	What General Improvements To the Plans Are Needed
Bell South: Six states have approved metrics and standards and a remedy plan in effect as of comment date of 1/22/02.								
Alabama	Not yet. BST has been reporting results based on the GA Metrics.	Docket No. 25835	Metrics were considered during the 271 hearings.	Based on BST's regional set of metrics, adjusted as required.	TBD, but BST generally amenable to six-month review.	Not yet, but BST and CLECs have both proposed remedy plans.	No test planned.	TBD
Florida	Yes. An order has been issued, and BST has filed a proposed compliance plan. The CLECs have filed comments. A vote is expected on the compliance plan soon.	Docket No. 000121-TP, Order No. PSC-01-1819-FOF-TP, issued 9/10/01	Permanent Docket	GA based metrics plus some additional metrics (e.g., Billing Errors Correcting in X Days) from other states, e.g., Texas. Commission also used experience from the 3rd party test to modify some of the business rules, exclusions and benchmarks.	Yes.	Yes. Plan is per measure and includes more submeasures than any other BST state. Plan includes one of better statistical test methodologies in region. Severity component is very weak BST given long time to implement plan and it is not contingent on 271 approval.	KPMG is using a set of interim Metrics to evaluate results of 3rd party OSS Test. KPMG has not provided final recommendations yet. Test may not conclude until end of January 2002 however, KPMG has indicated there will be a delay re: findings w/r/t sufficiency of interim Metrics. PUC order includes annual audits paid for by BST over next 5 years.	Metrics and benchmarks are one of best in region, but severity component of remedy plan is very weak and BST is given a long period of time to implement.
Georgia	Yes. Order issued on 1/16/01.	Docket No. 7892-U.	Generic proceeding.	GA metrics are basis for metrics in most BST states.	Yes.	Yes. Remedy plan has parameter delta—Tier I 0.5 and Tier II 0.35 for judging parity, but it is not strong enough.	KPMG is still testing them.	Metrics need improvement. Remedy plan is not strong enough.

STATE METRICS MATRIX PREPARED BY WORLDCOM

ILEC/ State	Has State Ordered Metrics and Standards	Docket/ Order Number	How Metrics and Standards Were Adopted	Whether Metrics and Standards Are Regional or State Specific	Does State Hold Periodic Reviews of the Metrics and Standards	Whether Metrics and Standards Have an Associated Remedy Plan	Whether a 3rd Party Tested or Audited the Metrics	What General Improvements To the Plans Are Needed
Kentucky	Yes. Order issued on 10/19/01.	Case No. 2001-105	KY adopted metrics and standards similar to GA.	Though PUC had a full hearing, the decision mirrors the GA plan, except for 2 metrics that are held in abeyance.	Yes.	Yes, it took effect 10/2001. Plan mirrors the GA plan.	No.	KY is better than what BST was advocating but metrics need improvement. Remedy plan is not strong enough.
Louisiana	Yes. First order issued on 5/14/01. A second order was issued on 7/31/01.	Docket No. U-22252, Subdocket C.	Collaborative workshops. Also state 271 decision added a new metric (for UNE-P loss of dial tone) and associated remedies.	One of first states in region to develop metrics, so not as similar to GA.	Yes. (Currently underway).	Yes, took effect 7/01, which was prior to 271 approval. Plan is not very effective, as payments are very low. Plan includes the 1 critical delta as proposed by BST without much change.	No, though KPMG audit is to be part of current review.	Weak on benchmarks and remedies compared to other BST states.
Mississippi	Yes. Order issued on 10/4/01. Metrics are based on BST's proposed SQM and SEEM plans, which are similar to GA's.	Final Order, Docket No. 97-AD-321.	No Collaboratives. Adopted as part of state 271 approval issued on 10/4/2001.	Similar to GA's metrics.	Per PSC Order, Metrics can be revisited upon BST's request or PSC's Motion. Also, while Order requires BST to use GA metrics, it's unclear whether updates will be made when GA metrics change as a result of its six-month reviews.	Yes, but uses 1 delta proposed by BST and remedies will not be paid until after BST "exercises an FCC grant of interLATA authority in Mississippi." Also, MSPSC removed one metric that was causing BST to pay remedies in GA.	No, BST has relied on GA 3rd Party Test in its 271 advocacy.	WCOM requires 12 additional metrics, better business rules, stronger standards, and additional levels of disaggregation, including geographic basis. WCOM also requires stronger remedies.

STATE METRICS MATRIX PREPARED BY WORLDCOM

ILEC/ State	Has State Ordered Metrics and Standards	Docket/ Order Number	How Metrics and Standards Were Adopted	Whether Metrics and Standards Are Regional or State Specific	Does State Hold Periodic Reviews of the Metrics and Standards	Whether Metrics and Standards Have an Associated Remedy Plan	Whether a 3rd Party Tested or Audited the Metrics	What General Improvements To the Plans Are Needed
North Carolina	No. BST advocates for its SQMs and its SEEM remedy plan which was approved by the GA PSC. However, BST did not propose the metrics in GA PSC's order verbatim.	P-100, Sub 133k (Generic docket) (briefing complete; awaiting order) and P-55, Sub 1022 (271 app) (briefs due 12/7).	Currently, a generic PM docket is open and BST's 271 docket is open. An industry task force reported to PUC, but only real changes BST made to its plans were based on changes GA PSC ordered.	If BST's metrics are approved, plan will be very similar to GA's.	TBD	Not yet. In addition, BST advocates that its remedy plan only be effective upon FCC 271 grant.	No, BST has relied on GA 3rd Party Test in its 271 advocacy.	Pending final ruling. BST proposal is lacking as WCOM requires 12 additional metrics, better business rules, stronger standards, and additional levels of disaggregation, including geographic basis. WCOM also requires stronger penalties.

STATE METRICS MATRIX PREPARED BY WORLDCOM

ILEC/ State	Has State Ordered Metrics and Standards	Docket/ Order Number	How Metrics and Standards Were Adopted	Whether Metrics and Standards Are Regional or State Specific	Does State Hold Periodic Reviews of the Metrics and Standards	Whether Metrics and Standards Have an Associated Remedy Plan	Whether a 3rd Party Tested or Audited the Metrics	What General Improvements To the Plans Are Needed
South Carolina	Yes, as of 11/6/01, however, no written order yet. The PSC intends to require BST to report against its SQMs on a regular basis to prevent backsliding	Docket 200-209-C.	No Collaboratives. Approved by PSC as part of BST's SGAT-271 application on 11/6/2001.	PSC ordered BST's SQMs and SEEM/ Incentive Payment Plan that are similar those approved by GA PSC.	For metrics, it is unclear. Initial review of incentive plan will be held 6 months after BST's 271 application is approved by the FCC. Will be reviewed every 6 months thereafter.	Yes. But only becomes effective when 271 granted by FCC. Plan ppears to be same as proposed by BST. May be only BST state to require inclusion into ICA before plan takes effect. Commissioners stated PUC would fine BST in addition to the plan if it saw poor performance. CLECs would not be required to request such fines.	No, BST has relied on GA 3rd Party Test in its 271 advocacy.	Plan is based on GA. WCOM requires 12 additional metrics, better business rules, stronger standards, and additional levels of disaggregation, including geographic basis. WCOM also requires stronger remedies.
Tennessee	Not yet. PUC has held a hearing to decide on metrics and remedies. Anticipated BST will be required to report results at state level (which would be a change).	Docket No. 01-00193	Full hearing.	TBD	TBD	TBD. Plan stemmed from ITC^DeltaCom ICA arbitration grant. Plan is more like CLECs' plan than BST's.	TBD	TBD

STATE METRICS MATRIX PREPARED BY WORLDCOM

ILEC/ State	Has State Ordered Metrics and Standards	Docket/ Order Number	How Metrics and Standards Were Adopted	Whether Metrics and Standards Are Regional or State Specific	Does State Hold Periodic Reviews of the Metrics and Standards	Whether Metrics and Standards Have an Associated Remedy Plan	Whether a 3rd Party Tested or Audited the Metrics	What General Improvements To the Plans Are Needed
Qwest: No state has an approved set of metrics or a remedy plan as of comment date of 1/22/02.								
Arizona	No. The metrics, known as performance indicator definitions ("PIDs") are 90% complete, but have not been formally approved yet. They will be in the Qwest's 271 filings to the FCC, no earlier than February 2002 and are in the ACC 271 record now.	Docket No. T-00000A-00-0238.	AZ OSS TAG Meetings and Workshops.	The metrics and incentive plans are state-specific but very similar to ROC PIDs, with some slight state variation. (The PIDs were developed in AZ and ROC simultaneously.)	Yes. Per PAP updated in a six-month review. CLECs are also seeking to address metric changes in the still unresolved Change Mgmt Process and have also requested more frequent revision in unresolved PAP review process.	Yes, but a CLEC cannot receive any penalties unless it opts into the Incentives Plan (PAP). A subset of the PIDs are included in the PAP and a subset of these are eligible for incentives.	Yes. CGE&Y audited the metrics.	Some metrics are "diagnostic" and require standards. Some existing standards are too lenient. There are some missing metrics e.g., Change Management. .

STATE METRICS MATRIX PREPARED BY WORLDCOM

ILEC/ State	Has State Ordered Metrics and Standards	Docket/ Order Number	How Metrics and Standards Were Adopted	Whether Metrics and Standards Are Regional or State Specific	Does State Hold Periodic Reviews of the Metrics and Standards	Whether Metrics and Standards Have an Associated Remedy Plan	Whether a 3rd Party Tested or Audited the Metrics	What General Improvements To the Plans Are Needed
Colorado	No. The metrics, performance indicator definitions ("PIDs") are 90% complete, but have not been formally approved yet. They will be in the Qwest's 271 filings to the FCC, no earlier than February 2002 and are in the CoPUC 271 record now. WCOM is adding standards to "diagnostic" metrics, revisiting standards and metrics, and advocating for new metrics, e.g., Change Mgmt. In addition to metrics and an incentive plan, state also has Wholesale Quality of Service rules (4 CCR 723-43), which were developed in 1997-8, although they are not as extensive.	Docket Nos. 97I-198T & 01I-041T	ROC TAG Meetings and Workshops.	The metrics in the incentive plans are regional and the metrics in the wholesale rules are state specific.	Incentive plan metrics may be updated in a six-month review per the PAP. CLECs are also seeking to address metric changes in the still unresolved Change Mgmt Process. The Wholesale Quality of Service rules have to be changed through a separate rulemaking proposed by the PUC, there is no routine review.	Yes, but a CLEC cannot receive any payments unless it opts into the Incentives Plan (PAP). Also, no payments are made until Qwest receives 271 authorization The Wholesale Quality of Service rules also include an incentive component, whose payments must be accepted in lieu of another remedy.	Liberty Consulting has audited the PIDs for the ROC. The Wholesale Quality of service rules were not tested.	Some metrics are "diagnostic" and require standards. Some existing standards are too lenient. There are some missing metrics Colorado Wholesale Quality of Service rules are not good in comparison to ROC PIDs because they are not as complete and comprehensive.

STATE METRICS MATRIX PREPARED BY WORLDCOM

ILEC/ State	Has State Ordered Metrics and Standards	Docket/ Order Number	How Metrics and Standards Were Adopted	Whether Metrics and Standards Are Regional or State Specific	Does State Hold Periodic Reviews of the Metrics and Standards	Whether Metrics and Standards Have an Associated Remedy Plan	Whether a 3rd Party Tested or Audited the Metrics	What General Improvements To the Plans Are Needed
ROC, except Arizona, Colorado Minnesota and South Dakota	The metrics are 90% complete, but have not been formally approved yet. They will likely be by the individual state PUC's in their 271 findings to the FCC, no earlier than February 2002. WCOM is adding standards to "diagnostic" metrics, revisiting standards and metrics, and advocating for new metrics, e.g., Change Mgmt. In Utah, in addition to metrics and incentive plan, there are specific Wholesale Quality of Service rules (R746-369), although they are not as extensive.	Various state dockets.	ROC OSS TAG Meetings and Workshops, and AZ OSS TAG Meetings and Workshops.	The metrics and incentive Plans are regional. (Metrics were developed in AZ and ROC simultaneously. Metrics are generally the same, with limited exceptions.)	Yes. Updated at six-month review per the proposed PAP. CLECs are also seeking to address metric changes in the still unresolved Change Mgmt Process. The Utah Wholesale Quality of Service rules have to be changed through a separate rulemaking proposed by the PUC, there is no routine review.	Yes, but a CLEC cannot receive any penalties unless it opts into the Incentives Plan (PAP). A subset of the PIDs are included in the PAP and a subset of these are eligible for incentives.	Yes. Liberty Consulting Group audited the metrics. The Wholesale Quality of service rules were not tested.	Some metrics are "diagnostic" and require standards. Some existing standards are too lenient. There are some missing metrics. Utah Quality of Service rules are not good by comparison because they are more limited.

STATE METRICS MATRIX PREPARED BY WORLDCOM

ILEC/ State	Has State Ordered Metrics and Standards	Docket/ Order Number	How Metrics and Standards Were Adopted	Whether Metrics and Standards Are Regional or State Specific	Does State Hold Periodic Reviews of the Metrics and Standards	Whether Metrics and Standards Have an Associated Remedy Plan	Whether a 3rd Party Tested or Audited the Metrics	What General Improvements To the Plans Are Needed
Minnesota	Not yet.	There are two open dockets dealing with metrics and penalties. Docket No. P421/M-00-849 was opened several years ago, and a 271 PAP docket (Docket No. P421/M-01-1376).	Docket was intended to be in place prior to any 271 PAP. However, it does not look like that will occur. This case should be before the PUC for a final decision in January 2002. Order to include metrics and incentives.	Metrics will most likely based on ROC PIDs. The Wholesale Docket metrics will likely be state specific.	TBD. Likely that both dockets will include a review process.	TBD. Likely that both dockets will include an incentives plan.	TBD	TBD
Nebraska	Not yet.	PUC has opened a wholesale service quality docket. The docket was concluded by stating that Qwest should file a PAP as part of 271 and PUC declines to use its state authority to impose penalties.	N/A	N/A	N/A	N/A	N/A	N/A

STATE METRICS MATRIX PREPARED BY WORLDCOM

ILEC/ State	Has State Ordered Metrics and Standards	Docket/ Order Number	How Metrics and Standards Were Adopted	Whether Metrics and Standards Are Regional or State Specific	Does State Hold Periodic Reviews of the Metrics and Standards	Whether Metrics and Standards Have an Associated Remedy Plan	Whether a 3rd Party Tested or Audited the Metrics	What General Improvements To the Plans Are Needed
South Dakota	Not yet.	N/A	No proceedings yet.	N/A	N/A	No incentives have been established yet.	N/A	N/A
SBC: 12 states have metrics and standards in place but of those only 7 states have a remedy plan in effect as of comment date of 1/22/02.								
Arkansas	Yes.	Docket No. 00-211-U	271 proceeding	Modeled after Texas 271 plan measures and standards.	Yes, reviews conducted every 6 months. TX PUC will conduct the review and AR is free to participate.	Yes. Based on TX remedy plan. While % of net revenues is the same as TX, dollar amounts are specific to AR.	No	Remedy plan weak since based on flawed TX K table. OSS not subject to 3rd party test.
California	Yes. Pacific has had measures and standards since August 1999. Measures were revised effective May 2001 to incorporate parties' negotiated changes to the metrics.	Proceeding No. R.97-10-016/ I.97-10-017, decision D.99-08-020, and D.01-05-087.	The measurements resulted from collaborative negotiations between Pacific, Verizon and the CLECs as part of the PUC's investigation into the OSS performance of Pacific and Verizon. The Commission has adopted a Change Mgmt Process (completed in Feb. 1999) and performance measures. The implementation of a performance incentive plan is pending.	The metrics were developed specifically for California and Nevada.	The CPUC provides for periodic reviews of the measures. Review is initiated by the CPUC via a pre-hearing conference. Parties propose changes, negotiate and agree to settle whenever possible. Parties submit their agreements and open issues to the CPUC for it to approve and where there are issues, to decide.	Almost. Final decision adopting payment amounts for a performance incentive plan will be adopted in February 2002. This decision plus the decision adopting the incentives model (D. 01-01-037) in January 2001 will comprise California's incentives plan.	Yes, the measures were audited by PWC and also used as an evaluative tool as part of the 3rd party OSS Test.	Generally ok although the real test of the measures and standards will occur once commercial volumes exist. No incentive payments have been made yet. It is possible that the parties have overlooked a process that turns out to be critical to the OSS process, or that the ILEC's interpretation of the business rules

STATE METRICS MATRIX PREPARED BY WORLDCOM

ILEC/ State	Has State Ordered Metrics and Standards	Docket/ Order Number	How Metrics and Standards Were Adopted	Whether Metrics and Standards Are Regional or State Specific	Does State Hold Periodic Reviews of the Metrics and Standards	Whether Metrics and Standards Have an Associated Remedy Plan	Whether a 3rd Party Tested or Audited the Metrics	What General Improvements To the Plans Are Needed
								allows it to under-report performance failure